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# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

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December 6, 2006

TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor *pgl*  
Dave Darby, Team Lead

FROM: Wayne H. Western, Environmental Scientist III, Engineering and Bonding *WHW*

RE: Plant Overflow Pond, Savage Services Corporation, Savage Coal Terminal,  
Permit C/007/0022, Task ID #2706

### SUMMARY:

On November 27, 2006, the Division received an application for an additional sediment pond at the Savage Coal Terminal. The Permittee called the new sediment pond the Plant Overflow Pond. The pond will be constructed in the existing pad area. This amendment mentions the engineering and bond aspects of the proposed amendment.

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**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

**HYDROLOGIC INFORMATION**

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

**Analysis:**

**Ponds, Impoundments, Banks, Dams, and Embankments**

The Permittee met the minimum requirements for the Plant Overflow Pond by:

- Having the plans and maps prepared and certified by a qualified, registered professional engineer.
- The pond is similar to those already in existence. Therefore, the approved MRP contains information about the operation and reclamation of the pond and further information is not needed in the application.

**Findings:**

The Permittee met the minimum requirements of this section.

**MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS**

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

**Analysis:**

**Mining Facilities Maps**

The Permittee did not meet the minimum requirements for this section. The Permittee must show the pond, culvert and 6-inch waterline as if they were installed. The map meets the other requirements by showing the location of the new facilities.

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**Analysis:**

**Determination of Bond Amount**

The Permittee did not meet the minimum requirements for this section. The Permittee must include detailed reclamation costs for the Plant Overflow Pond. The Division needs that information so they can have an updated reclamation cost estimate.

**Findings:**

The information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Before approval, the Permittee must provide the following in accordance with:

**R645-301-830.140,** The Permittee must include detailed reclamation costs for reclaiming the Plant Overflow Pond. The Division needs the information to ensure that there is an updated reclamation cost estimate.

**RECOMMENDATIONS:**

The Division should deny the amendment until all of the above mention deficiencies have been addressed.